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*The GEO Group, Inc., incorrectly sued as GEO Re-Entry Group, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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**PLEASE TAKE NOTICE** that counsel for Defendant The GEO Group, Inc., incorrectly sued as GEO Re-Entry Group, LLC, (“GEO”) will move before this Court, at the United States District Court for the District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 on May 5, 2025, or a date to be assigned by the Court, for an Order granting leave for Joseph Negron, Jr. to make a special appearance as its counsel *pro hac vice* in the above-captioned action.

**PLEASE TAKE FURTHER NOTICE** that undersigned counsel for GEO reached out to Plaintiff's counsel on four separate occasions in an attempt to obtain consent to this motion, but has not received any response as of the date of this filing.

**PLEASE TAKE FURTHER NOTICE** that in support of the within motion, GEO shall rely upon the Declaration of Geoffrey S. Brounell and the Declaration of Joseph Negron, Jr., which are submitted herewith, but that no brief is submitted because this motion is addressed to the discretion of the Court pursuant to Local Rule 101.1(c).

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order granting the requested relief is submitted herewith.

Dated: April 11, 2025

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Geoffrey S. Brounell

Geoffrey S. Brounell